IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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SUPPLEMENTAL MEMORANDUM OF LAW IN FURTHER SUPPORT OF DEFENDANTS' CONSOLIDATED MOTION TO DISMISS PLAINTIFFS' COMPLAINT

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I. INTRODUCTION

Daniel's Law is an impermissible content-based restriction on truthful, protected speech that lacks any culpability requirement. The Supreme Court has never sanctioned such a law. To the contrary, even for unprotected speech of low-to-no constitutional value, the First Amendment requires a culpable mental state before liability may be imposed. This Court should follow the Supreme Court's routine practice of striking down—not re-writing—content-based speech restrictions that do no not meet constitutional requirements.

If this Court is nonetheless inclined to write a culpability requirement into the statute, then that requirement should be based on intent, *i.e.*, the specific intent to publish a covered person's home address or unpublished home telephone number despite knowing that a covered person has made a valid request under the statute. Plaintiffs have sought to justify the speech restriction here based on the common law tort of invasion of privacy. But that tort in New Jersey requires intentional conduct. No less should be required here. Indeed, the lack of any such intent requirement is a key part of what is wrong about this case: Defendants did not *intend* to "disclose" any covered person's information in disregard of any valid non-disclosure requests; rather, the email blasts sent out by Atlas were designed to frustrate any effort to act on them within a short timeframe—*i.e.* to make Defendants liable regardless of their intent. Any culpability requirement should not brook such litigation gamesmanship.

II. DANIEL'S LAW IS FACIALLY UNCONSTITUTIONAL BECAUSE IT HAS NO CULPABILITY REQUIREMENT

To the joining Defendants' knowledge, the Supreme Court has never upheld a content-based law imposing liability on fully protected speech without a culpability requirement. Indeed, it has rejected "categorical prohibitions" on truthful, protected speech with "no scienter" showing needed to impose damages "where important First Amendment interests are at stake." *Florida Star v. B.J.F.*, 491 U.S. 524, 539 (1989). Even for *unprotected* speech like true threats, the Supreme Court has held that "the First Amendment . . . demand[s] a subjective mental-state requirement." *Counterman v. Colorado*, 600 U.S. 66, 75 (2023). Daniel's Law imposes a content-based restriction on *protected* speech and contains no such requirement. It is facially unconstitutional.

A. Laws Punishing Speech Must Have Fault Requirements

"Prohibitions on speech have the potential to chill, or deter, speech outside their boundaries." *Counterman*, 600 U.S. at 75. Because the First Amendment requires "breathing room for free expression," *United States v. Hansen*, 599 U.S. 762, 769 (2023), it does not permit laws that might cause speakers to "'self-censor[]'" so as to "steer[] 'wide of the unlawful zone.'" *Counterman*, 600 U.S. at 75. An essential tool to prevent such chilling "is to condition liability on the State's showing of a culpable mental state." *Id.* at 77. Failing to impose such a safeguard, or "punishing [speech] without regard to scienter[,] would 'have the collateral effect

of inhibiting' protected expression"—a result that is anathema to the First Amendment. *Id*. (quoting *Smith v. California*, 361 U.S. 147, 151 (1959)).

Accordingly, before imposing tort liability, the Court has demanded some form of culpability requirement. For example, in the defamation context, "actual malice" is required for public officials, *New York Times Co. v. Sullivan*, 376 U.S. 254, 279-80 (1964), and even for private figures, at a minimum, negligence is required, *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 347 (1974); *see also Time, Inc. v. Hill*, 385 U.S. 374, 397 (1967) (recklessness required for false light). This follows the Court's broader rule that laws restricting even unprotected speech—i.e., speech "'of such slight social value . . . that any benefit that may be derived … is clearly outweighed by the social interest' in [its] proscription"—must include a mens rea requirement. *Counterman*, 600 U.S. at 73-74 (citation omitted); *see id.* at 79-80 (recklessness required for true threats); *Hess v. Indiana*, 414 U.S. 105, 109 (1973) (intent required for incitement).

This rule applies *a fortiori* to truthful, protected speech. Consider the Supreme Court's decision in *Florida Star*. There, a newspaper had been held liable for publishing a crime victim's name under a "negligence *per se*" standard, based on a statute that contained no "scienter requirement of any kind." *See id.* at 528, 539. The Supreme Court reversed, holding that it would be "perverse" if "truthful publications [we]re less protected . . . than even the least protected defamatory falsehoods." *Id.*

at 539; *see id.* at 540 (explaining why "individualized adjudication" of fault is "indispensable" for speech-restrictive laws). That result, the Court found, was not constitutionally permissible.

B. A No-Fault Content-Based Restriction Is Especially Problematic

The concerns with proscribing truthful speech without a culpability requirement are all the more acute when evaluating a statute, like Daniel's Law, that imposes a *content-based* restriction on protected speech. Content-based restrictions are among the most invidious and suspect types of regulations on speech. *See, e.g.*, *Schrader v. Dist. Att'y of York Cnty.*, 74 F.4th 120, 127 (3d Cir. 2023) (holding content-based restriction justified by privacy interest unconstitutional as-applied); *see also Cox Broad. Corp. v. Cohn*, 420 U.S. 469, 495 (1975) (rejecting liability for invasion of privacy where liability would turn on "the content of a publication"). Such restrictions are "presumptively unconstitutional," "even if [they] do[] not discriminate among viewpoints within that subject matter." *Reed v. Town of Gilbert, Ariz.*, 576 U.S. 155, 163, 169 (2015). A content-based speech restriction is unconstitutional unless it is the least restrictive means of furthering the state's asserted interest. And a no-fault statute lacking any culpability requirement plainly cannot be the least restrictive means of regulating speech. *Cf. Schrader*, 74 F.4th at 127 (holding that criminal sanction with a "willfulness" mens rea requirement failed strict scrutiny where civil penalties could have been used instead).

C. Daniel's Law Is an Unconstitutional Strict Liability Statute

Like the law in *Florida Star*, Daniel's Law is written as a strict liability statute. Daniel's Law states only that on "written notice to the person from whom the authorized person is seeking nondisclosure," an entity "shall not disclose or re-disclose on the Internet or otherwise make available" covered information, beginning "not later than 10 business days following receipt thereof." N.J.S.A. 56:8-166.1(a)(1), (2). And "liability follows automatically from" a violation, *Florida Star*, 491 U.S. at 539, without any requirement of culpability. Nothing in Daniel's Law requires knowledge that a notice was "received." There is not even room for courts to assess a defendant's mental state in imposing damages; the statute simply says that courts "*shall* award" actual damages, not less than liquidated damages of $1,000. N.J.S.A. 56:8-166.1(c)(1) (emphasis added); *Maine Cmty. Health Options v. United States*, 590 U.S. 296, 310 (2020) ("[T]he word 'shall' usually connotes a requirement"). So here, as in *Florida Star*, the First Amendment prohibits imposing liability without any inquiry into a speaker's mental state.

This result is especially clear in light of the legislative history and statutory context. At one point, Daniel's Law prohibited disclosure only when "*a reasonable person would believe* that providing that information would expose another to harassment or risk of harm to life or property." N.J.S.A. 56:8-166.1(a) (2021) (emphasis added). But the Legislature removed that language, indicating its intent

to impose liability *without* requiring any kind of negligence, and instead automatically following a violation. N.J.S.A 56:8-166.1(a). On the other hand, the Legislature included mens rea requirements in the criminal provisions it enacted to punish violations of Daniel's Law—more evidence that if the Legislature intended to impose a culpability requirement, it knew how to do so. *See* N.J.S.A. 2C:20-31.1(d); *see Custis v. United States*, 511 U.S. 485, 492 (1994) (finding that "Congress' omission of similar language in [one provision] indicates that it did not intend to give defendants" the same right included in the other provision).

Plaintiffs and the Attorney General ("AG") resist this conclusion, positing that Daniel's Law requires "negligence." Tr. of Oral Arg. at 79:3-13 (Plaintiffs); *id.* at 93:22-23 (AG). But the concept of negligence does not appear anywhere in the law's text—which requires only (1) receipt of "written notice" and (2) disclosure or "mak[ing] available" of covered information 11 business days later. N.J.S.A. 56:8-166.1(a)(1), (2). And, as noted above, the Legislature actually *removed* the only limited culpability requirement that was previously in the civil section of the statute.

Plaintiffs and the AG suggested at oral argument that the "written notice" requirement, which was added when the limited negligence requirement was deleted, somehow imposes a negligence standard. *See* Tr. of Oral Arg. at 83:2-4 (Plaintiffs); *id.* at 93:22-23 (AG). This is wholly unfounded, for several reasons.

First, this Court must "presume" that the Legislature "intends" its amendment to the law "to have real and substantial effect." *Ross v. Blake*, 578 U.S. 632, 641-42 (2016). Reading the notice requirement to simply replace the prior negligence requirement would improperly "act[] as though" the amendment "had not taken place." *Id.* at 642.

Second, and more importantly, the written-notice requirement does not "set[] up a kind of reasonable person standard" that negligence demands. Tr. of Oral Arg. at 94:4-5. Nothing in the written-notice provision actually limits liability to situations where a defendant acts unreasonably in any way. For example, if a covered person sends the requisite "written notice," but it is accidentally dropped on a mailroom floor, liability might still attach if a court found it to constitute "receipt." The same goes if a sole proprietorship is found to "receive" a notice while the owner is traveling on holiday without access to email. Indeed, it is apparent that *Plaintiffs* believe Daniel's Law imposes liability even if a litigation vehicle sends thousands of purported "notices" over the December holidays, in a manner that obviously risked that the messages would be blocked by spam filters, and compliance complicated by holiday closures and vacations.

Third, contrary to the AG's suggestion, nothing in Daniel's Law limits its application to "very high-tech compan[ies]" or entities that "specialize in data management" Tr. 94:6-7. *Any* "person, business, or association" is subject to the law.

N.J.S.A. 56:8-166.1(a)(1). So no reasonableness requirement can be read in based on the entities the statute purports to cover, or on assumptions about whether those entities are equipped to handle a notice under the law.

III. IF THIS COURT READS IN A CULPABILITY REQUIREMENT, IT SHOULD REQUIRE INTENT

As explained above, the plain text of Daniel's Law does not include a culpability requirement, and this Court should not read one into the statute in an attempt to save it.[1] Rather, this Court should facially invalidate the statute. *See Smith*, 361 U.S. at 155 (holding that law with no culpability requirement "cannot stand under the Constitution").[2] But if this Court nevertheless decides to read a culpability requirement into Daniel's Law, that requirement should be one of intent—i.e., the specific intent to publish a covered person's home address or unpublished home telephone number despite knowing that a covered person has made a valid request under the statute. There are two reasons why.

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[1] The New Jersey Supreme Court would likely "strik[e] the constitutionally defective subsection" rather than read in an alternative culpability requirement. *See State v. Pomianek*, 110 A.3d 841, 855 (N.J. 2015) (declining to "read[] into subsection (a)(3) a mens rea element that is absent from the statute"); *see also Packard v. Provident Nat. Bank*, 994 F.2d 1039, 1046 (3d Cir. 1993) (federal court must predict how state's highest court would answer state law question).

[2] Defendants maintain that, even if Daniel's Law had a culpability requirement of intent, the statute would still be unconstitutional for the reasons stated in Defendants' prior briefing, because it is not narrowly drawn to the interest it purports to serve.

First, a robust culpability requirement would be more consistent with Supreme Court precedent. Across varied contexts, the Supreme Court has required a culpable state of mind to impose liability even for unprotected speech. *See supra.* Even for defamation, incitement, and threats—each of "no constitutional value"—the Court has required heightened mens rea terms to avoid chilling other, protected speech. *Counterman*, 600 U.S. at 76 (citation omitted); *see id.* at 75-76 (public-figure defamation requires at least recklessness); *id.* at 76 (incitement requires intent); *id.* at 79-80 (true threats require recklessness). If that much "breathing space" is required for unprotected speech, then even more is required for the protected speech restricted by Daniel's Law. *Id.* at 80. Anything less would "engender[] the perverse result" that disclosures of addresses and phone numbers "are less protected by the First Amendment" than categories of unprotected speech like direct threats—the very result disapproved in *Florida Star*. 491 U.S. at 539.

Second, an intent-based standard would be more consistent with the common law privacy torts that Plaintiffs and the AG have sought to characterize as analogous to Daniel's Law. Defendants continue to believe that Daniel's Law is not a privacy law and is not analogous to any common law privacy tort. But if this Court is inclined to accept Plaintiffs' characterization, then it should also adopt the implication of that characterization—namely, that Daniel's Law requires intentional tortious conduct.

This Court suggested at oral argument that the privacy tort most analogous to

Daniel's Law is the tort of invasion of privacy. Tr. of Oral Arg. at 94:21-22; 95:9-10; 96:21-24; 98:7-16. The New Jersey Supreme Court has defined "invasion of privacy" as "an intentional intrusion, 'physical[] or otherwise, upon the solitude or seclusion of another,'" tracking the Restatement's definition of the more specific privacy tort of intrusion upon seclusion. *G.D. v. Kenney*, 15 A.3d 300, 319-20 (N.J. 2011) (citation omitted); Restatement (Second) of Torts, § 652B.[3] In New Jersey, intrusion on seclusion is an intentional tort. Thus, only "[o]ne who intentionally intrudes . . . upon the solitude or seclusion of another" is liable for an invasion of privacy. *Id.*; *see* New Jersey Model Jury Instructions Charge 3.14; *see also Jeter v. New Jersey Transit*, 2009 WL 1118727, at *7 (N.J. App. Div. Apr. 28, 2009) (identifying "invasion of privacy" as an "intentional tort[]"). If this Court wishes to harmonize Daniel's Law with what it views as its closest common law tort analogue, it should conclude that intent is required to impose liability. *Cf. Meyer v. Holley*, 537 U.S. 280, 289-290 (2003) (rejecting duty that would impose greater liability than relevant common law analogue would suggest).

IV. CONCLUSION

The Court should dismiss Plaintiffs' claims with prejudice.

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[3] The Restatement explains that "the invasion of privacy has been a complex of four distinct wrongs," of which intrusion upon seclusion is one. Restatement (2d) of Torts § 652(A); *see also* New Jersey Model Jury Instructions Charge 3.14. Defendants believe that none of the privacy torts is analogous to Daniel's Law for the reasons explained in the reply brief. *See* Reply 22.

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